

**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

21-cv-5350-PKC-CLP.

Plaintiff,

-against-

**RICHARD XIA, a/k/a YI XIA; AND FLEET
NEW YORK METROPOLITAN REGIONAL
CENTER, LLC, f/k/a FEDERAL NEW YORK
METROPOLITAN REGIONAL CENTER, LLC,**

Defendants,

-and-

**JULIA YUE, a/k/a JIQING YUE,
XI VERFENSTEIN, and XINMING YU,**

Relief Defendants.

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Rule 1.16 of the New York Rules of Professional Conduct, which is incorporated into the Rules of this Court (*see* SDNY and EDNY Local Rule 1.5(b)(5)), and Local Civil Rule 1.4, The Law Offices of Kameli & Associates, P.C. (the “Firm”) hereby files this motion to withdraw as counsel for Defendants Richard Xia and Fleet New York Metropolitan Regional Center, LLC and Relief Defendant Julia Yue (collectively, the “Defendants”) in this action and, in support thereof, states as follows:

1. On May 3, 2022, Benjamin Y. Kaufman, Robert Altchiler, and Mark Rifkin filed an appearance on behalf of Defendants.

2. On May 3, 2022 Defendants discharged The Law Offices of Kameli & Associates, P.C. and requested that the Firm withdraw from this matter.
3. Withdrawal is, therefore, required under New York Rule of Professional Conduct 1.16(b)(3), which provides that “a lawyer shall withdraw from representing a client when . . . the lawyer is discharged[.]”
4. Additionally, withdrawal for the Firm is permissive under New York Rule of Professional Conduct 1.16(c)(10), which provides that “a lawyer may withdraw from representing a client when . . . the client knowingly and freely assents to termination of the employment[.]”
5. For the foregoing reasons, the Firm respectfully requests that its motion for withdrawal be granted.

Respectfully submitted,

LAW OFFICES OF KAMELI & ASSOCIATES, P.C.

By: /s/Taher Kameli/

Taher Kameli, Esq.

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Dated: May 03, 2022

UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against-

RICHARD XIA, a/k/a YI XIA; AND FLEET
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CENTER, LLC, f/k/a FEDERAL NEW
YORK METROPOLITAN REGIONAL
CENTER, LLC;

Defendants,

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JULIA YUE, a/k/a JIQING YUE;
XI VERFENSTEIN; and XINMING YU;

Relief Defendants.

Civil Action No. 21-cv-5350-PKC-CLP

Certificate of Service

I, Taher Kameli, hereby certify that on May 3, 2022, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of New York by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/Taher Kameli/

Taher Kameli, Esq.

Law Offices of Kameli & Associates, P.C.

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Dated: May 3, 2022